

HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

RUDY ST. GERMAIN, an individual,

Plaintiff,

v.

TREIF USA, INC. d/b/a TREIF, TREIF USA, a
Delaware corporation; and TREIF
MASCHINENBAU GMBH, d/b/a TREIF a
German corporation;

Defendants.

No. 2:18-cv-01600-BJR

**STIPULATED JOINT MOTION AND
ORDER TO AMEND CASE
SCHEDULE**

NOTE ON MOTION CALENDAR:
January 29, 2019

I. STIPULATION & JOINT MOTION TO AMEND CASE SCHEDULE

The parties Plaintiff Rudy St. Germain and Defendant TREIF USA, INC. by and through their counsel of record, hereby stipulate and seek an Order requesting that the Court amend its January 2, 2019 Order Setting Civil Case Schedule ("Scheduling Order") by setting new deadlines for joinder, amendment of the pleadings, expert reports, completion of discovery and dispositive motions. Good cause exists for the requested relief herein. *See* FRCP 16(b) and LCR 16(b)(5). Trial is set in this matter on November 4, 2019. The parties submitted a joint discovery plan to the court requesting dates consistent with the new dates

requested below. In addition, the parties still await completion of service of process, a notice of appearance and answer from Defendant TREIF MASCHINENBAU, GmbH, a German corporation, in this matter.

For the foregoing reasons, the parties respectfully request that the Court issue an Amended Case Scheduling Order with the new date for each respective deadline listed below:

Case Event	Previous Date	New Date
Deadline for joining additional parties	January 30, 2019	May 1, 2019
Deadline for filing amended pleadings	February 11, 2019	May 15, 2019
Deadline for Expert Disclosures	April 8, 2019	May 31, 2019
Deadline for Completion of Discovery	May 8, 2019	July 6, 2019
Deadline for Filing Dispositive Motions	June 7, 2019	August 6, 2019

The parties ask that all other deadlines in the original case scheduling order, including the trial date and pretrial deadlines, remain the same.

DATED this 28th day of January, 2019.

CONNELLY LAW OFFICES, PLLC

By: /s Micah R. LeBank

Micah R. LeBank., WSBA No. 38047

By: /s Marta L. O'Brien

Marta L. O'Brien, WSBA No. 46416

Attorneys for Plaintiff

2301 N. 30th St.

Tacoma, WA 98403-3322

1 Email: mlebank@connelly-law.com
2 mobrien@connelly-law.com

3
4 WILSON SMITH COCHRAN DICKERSON

5
6 By /s Whitney L.C. Smith
7 Whitney L.C. Smith, WSBA No. 21159
8 Gabriella Wagner, WSBA No. 42898
9 *Attorneys for Defendants*

10 901 Fifth Ave, Suite 1700
11 Seattle, WA 98164
12 Email: smithw@wscd.com
13 wagner@wscd.com
14
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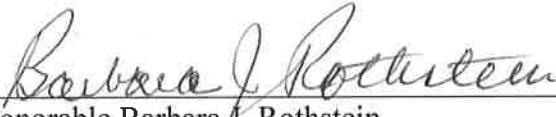
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3 **ORDER**

4 THIS MATTER having come before the above-entitled Court upon the parties agreed
5 stipulation for Amendment of the Case Schedule, in accordance with FRCP 16(b) and LCR
6 16(b)(5), NOW THEREFORE, it is hereby

7 ORDERED, ADJUDGED, AND DECREED that the case schedule will be amended
8 according with the new deadlines set forth below:
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Case Event	Previous Date	New Date
Deadline for joining additional parties	January 30, 2019	May 1, 2019
Deadline for filing amended pleadings	February 11, 2019	May 15, 2019
Deadline for Expert Disclosures	April 8, 2019	May 31, 2019
Deadline for Completion of Discovery	May 8, 2019	July 6, 2019
Deadline for Filing Dispositive Motions	June 7, 2019	August 6, 2019

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16 DATED this 30th day of January, 2019.
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20 Honorable Barbara J. Rothstein

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3 Presented by:

4 CONNELLY LAW OFFICES, PLLC

5 By: /s/ Micah R. LeBank

6 Micah R. LeBank., WSBA No. 38047

7 By: /s/ Marta L. O'Brien

8 Marta L. O'Brien, WSBA No. 46416

Attorneys for Plaintiff

9 2301 N. 30th St.

Tacoma, WA 98403-3322

10 Email: mlebank@connelly-law.com

11 mobrien@connelly-law.com

12 WILSON SMITH COCHRAN DICKERSON

13
14 By: /s/ Whitney L.C. Smith

15 Whitney L.C. Smith, WSBA No. 21159

16 Gabriella Wagner, WSBA No. 42898

Attorneys for Defendants

17 901 Fifth Ave, Suite 1700

Seattle, WA 98164

18 Email: smithw@wscd.com

wagner@wscd.com